

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

ADAM GRAD, Individually and on behalf of
all others similarly situated,

Plaintiff,

vs.

IRONNET, INC., KEITH B. ALEXANDER,
JAMES C. GERBER, and WILLIAM E.
WELCH,

Defendants.

Case No. 1:22-cv-00449-RDA-JFA

CLASS ACTION

**MOTION OF JAMES SHUNK FOR APPOINTMENT AS
LEAD PLAINTIFF AND APPROVAL OF SELECTION OF COUNSEL**

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that pursuant to Section 21D of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4, as amended by the Private Securities Litigation Reform Act of 1995, lead plaintiff movant James Shunk hereby moves this Court, the Honorable Rossie D. Alston, Jr., United States District Judge of the United States District Court for the Eastern District of Virginia, 401 Courthouse Square, Alexandria, VA 22314, for an Order:

- (a) appointing James Shunk as Lead Plaintiff; and
- (b) approving James Shunk's selection of Bernstein Liebhard LLP as Lead Counsel and The Kaplan Law Firm as Local Counsel for the litigation.¹

This motion is supported by the accompanying Memorandum of Law, the concurrently filed Declaration of Matthew B. Kaplan, the pleadings and other filings in this action, and such other written or oral argument as may be permitted by the Court.

¹ Section 21D(a)(3)(B) of the PSLRA provides that within 60 days after publication of the required notice, any member of the proposed class may apply to the Court to be appointed as lead plaintiff, whether or not that class member had previously filed a complaint or otherwise appeared in the action. Consequently, counsel for James Shunk has no way of knowing whether any other members of the class will seek lead plaintiff at this time. As a result, counsel for James Shunk has been unable to confer with opposing counsel as prescribed in Local Civil Rule 7(E) prior to the filing of this motion. Upon review of any competing motions seeking lead plaintiff appointment, counsel for James Shunk will confer with opposing counsel to determine if a hearing on this motion is necessary and, if so, will arrange to set a hearing date.

Dated: June 21, 2022

Respectfully submitted,

THE KAPLAN LAW FIRM

/s/ Matthew D. Kaplan

Matthew B. Kaplan (VSB # 51027)

THE KAPLAN LAW FIRM

1100 N. Glebe Rd., Ste. 1010

Arlington, VA 22205

Tel: (703) 665-9529

mbkaplan@thekaplanlawfirm.com

*Local Counsel for James Shunk and Proposed
Local Counsel for the Proposed Class*

BERNSTEIN LIEBHARD LLP

Laurence J. Hasson

Joseph R. Seidman, Jr.

Jeffrey R. McEachern

10 East 40th Street

New York, NY 10016

Telephone: (212) 779-1414

Facsimile: (212) 779-3218

Email: lhasson@bernlieb.com

seidman@bernlieb.com

jmceachern@bernlieb.com

*Counsel for James Shunk and Proposed Lead
Counsel for the Proposed Class*

CERTIFICATE OF SERVICE

I hereby certify that on June 21, 2022, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing to all counsel of record.

Dated: June 21, 2022

/s/ Matthew B. Kaplan

Matthew B. Kaplan (VSB # 51027)
THE KAPLAN LAW FIRM
1100 N. Glebe Rd., Ste. 1010
Arlington, VA 22205
Tel: (703) 665-9529
mbkaplan@thekaplanlawfirm.com